



Michael F. Del Casino
Regulatory Division Manager

Suite 1000
1120 20th Street, NW
Washington DC 20036
202-457-2023
FAX 202-263-2616

September 8, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Dear Ms. Dortch:

Re: Petition for Declaratory Ruling of the Cellular Telecommunications & Internet
Association, CC Docket No. 95-116 and CC Docket No. 99-200

Dear Ms. Dortch:

On September 5, 2003, Rich Rocchini, Penn Pfautz (by phone), Mark Lancaster (by phone) and I, all representing AT&T, met with Pam Slipakoff and Cheryl Callahan of the Wireline Competition Bureau and Jared Carlson and Jennifer Salhus from the Wireless Bureau to discuss AT&T's positions in the above referenced matters. The attached charts, which were handed out at the meeting, provide the details of that discussion.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in dark ink, appearing to read "M Del Casino".

Attachment

cc: Pam Slipakoff
Cheryl Callahan
Jared Carlson
Jennifer Salhus

The Rate Center Issue

- Some ILECs contend that wireline numbers cannot be ported to wireless providers unless the wireless carrier has a presence and numbering resources in the rate center:
 - ▶ Wireless carriers claim they have numbering resources in only about 1 of 8 rate centers so this restriction would drastically curtail wireline to wireless porting – and competition.
 - ▶ ILECs respond that they will have little opportunity to port-in wireless numbers so intermodal porting should be restricted in any event.
- The issues raised by ILECS and CMRS carriers can be resolved.
- AT&T believes the industry can develop technical solutions that support intermodal portability to and from wireless carriers.
- To achieve intermodal portability, differences between the networks of the ILECs, whose switching is based on the location of the wire center, and the networks of the CLECs and CMRS providers must be recognized.

Source: AT&T, September 5, 2003

The Rate Center Issue

- CLECs - such as AT&T- connect at a single point within a LATA and port numbers from any rate center and need not have numbering resources in each rate center. CMRS providers generally use a single switch serving a geographic area defined by the cellular sites they have built or leased. Neither carrier bases its switch topography on the rate center.
- The rate center restriction proposed by the ILECs is misplaced and would represent an impediment to competition, with respect to VoIP, CMRS, and non-CMRS services.
- While AT&T believes there are technical solutions to the intermodal issues raised in the CTIA petition, the FCC has not yet developed the record needed to make such a ruling.

LRN as a Valid Assigned Number

- A local service provider (SP) must have a Location Routing Number (LRN) per switch per LATA as a network address, and the LRN must be from an NPA-NXX designated for that SP (e.g., 212-209-0000).
- Industry Numbering Committee (INC) Central Office Code guidelines list an LRN as criteria for numbering resources application.
- FCC order & INC guidelines require activation of an Assigned number (“working in the PSTN”) to show an NXX as “in service”.
- An SP cannot port-in customers without an LRN, but without assigning new lines of service from numbers in the LRN NXX, the SP can be providing service to hundreds of lines and customers.
- If customers are served via Local Number Portability (LNP), without Assigned numbers on the NXX, is the NXX “in service”?
- The SP must either disconnect NXX and return, or receive relief from the strict requirement for “in service” numbers to retain the NXX and LRN.

Source: AT&T, September 5, 2003